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August 21, 2020

The Honorable Leda Wettre
United States District Court for the District of New Jersey
50 Walnut Street
Newark, NJ 07102

RE :POLYNICE v. NEW JERSEY DEP'T OF CORRECTIONS

Docket No. 2:19-cv-16875-MCA-LDW

Dear Judge Wettre:

I represent Plaintiff Edwin Polynice. As we discussed at the recent case management conference on August 13, 2020, Mr. Polynice had disappeared into "Temporary Housing" for quite a bit of time, and I was not able to speak with him until August 14, 2020. When I spoke to him, I discovered that he had been hospitalized for quite a bit of time and suffered dire personal injury due (kidney failure) due to what appears to be the negligence and/or deliberate indifference of employees working for or with the Department of Corrections. As such, I have not been able to thoroughly finish amending the complaint by today, August 21, 2020, the day called for by the case management order.

I reached out to Chanell Branch, the Deputy Attorney General representing the Defendants to request more time to file the Motion to Amend the Complaint but did not receive a response. I tried to rush completion of the motion, but I do not think the rushed job would serve anyone's best interest.

I am therefore requesting an extension until Tuesday, August 25, 2020 to file the motion to amend the Complaint.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'M. Poreda', written in a cursive style.

MICHAEL POREDA